

Mr. Jeff Michael
Federal Mogul Corporation
2845 West State Road 28
Frankfort, IN 46041

Dear Mr. Michael:

Re: Exempt Construction and Operation Status,
023-12585-00003

The application from Federal Mogul Corporation, received on August 8, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following natural gas-fired wastewater evaporator, to be located at 2845 West State Road 28 Frankfort, Indiana, is classified as exempt from air pollution permit requirements:

- (a) One (1) natural gas-fired wastewater evaporator, with a maximum heat input capacity of 0.395 mmBtu/hr and exhausts to the atmosphere.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This existing source, including the emissions from this Exemption-023-12585-00003, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

NLJ

cc: File - Clinton County
Clinton County Health Department
Air Compliance - Eric Courthright
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Federal Mogul Corporation
Source Location: 2845 West State Road 28, Frankfort, Indiana 46041
County: Clinton
SIC Code: 3053
Operation Permit No.: 023-12585-00003
Permit Reviewer: Nysa L. James

The Office of Air Management (OAM) has reviewed an application from Federal Mogul Corporation relating to the construction and operation of natural gas-fired wastewater evaporator, consisting of the following equipment:

- (a) One (1) natural gas-fired wastewater evaporator, with a maximum heat input capacity of 0.395 mmBtu/hr and exhausts to the atmosphere.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 023-4829-00003, issued on December 14, 1995;
- (b) Exemption 023-7133-00003, issued on February 3, 1997;
- (c) Exemption 023-8357-00003, issued on April 30, 1997;
- (d) Administrative Amendment 023-8380-00003, issued on May 12, 1997; and
- (e) Administrative Amendment 023-8120-00003, issued on July 7, 1997.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on August 8, 2000.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (page 1 of 1).

The waste stream of the evaporator contains an oil content equal to or less than 1%, therefore based on 326 IAC 2-1.1-3 the unit is exempt from permitting requirements.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.02
PM-10	0.02
SO ₂	0.00
VOC	0.01
CO	0.04
NO _x	0.17

County Attainment Status

The source is located in Clinton County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clinton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Clinton County has been classified as attainment or unclassifiable for PM, PM₁₀, SO₂ and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	2.30
PM10	2.30
SO ₂	0.00
VOC	43.09
CO	0.00
NO _x	0.00

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.
- (b) This source would be an MSOP. However, the source still has an existing valid operating permit. The source shall submit an MSOP renewal application no later than ninety (90) days prior to the expiration date of the permit.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	0.02	0.02	0.00	0.01	0.04	0.17
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this Exemption-023-12585-00003, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this facility.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this facility.

State Rule Applicability - Wastewater Evaporator

326 IAC 2-6 (Emission Reporting)

This source is located in Clinton County and the potential to emit VOC is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 8-1-6 (General reduction requirements for new facilities) does not apply because the potential to emit of VOC is less than 25 tons per year.

Conclusion

The construction and operation of this natural gas-fired wastewater evaporator shall be subject to the conditions of the attached **Exemption 023-12585-00003**.

Appendix A: Emission Calculations

Natural Gas Combustion Only

MM Btu/hr 0.3 - < 10

One (1) natural gas-fired wastewater evaporator

Company Name: Federal Mogul Corporation

Address City IN Zip: 2845 West State Road 28, Frakfort, IN

CP: 023-12585

Plt ID: 023-00003

Reviewer: NLJ

Date: 09-07-2000

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.4

3.5

Pollutant

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.3	21.0
Potential Emission in tons/yr	0.02	0.02	0.00	0.17	0.01	0.04

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx Burner = 27, Flue gas recirculation = ND

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton